

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

**CASE NO. 23-81096-CIV-CANNON**

JULIE MEYER and, VIVA INVESTMENT  
PARTNERS AG,

Plaintiffs,

v.

RENE EICHENBERGER, NEW VENTURE  
ASSOCIATES, LLC, (ALTERNATIVE)2  
HOLDING AG n/k/a NEW VENTURE  
ASSOCIATES AG, CENTURY VENTURE  
SA, JOHN TEXTOR, and WYNDCREST  
HOLDINGS, LLC.,

Defendants.

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**NOTICE OF VOLUNTARY DISMISSAL**

PLEASE TAKE NOTICE that pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiffs, Julie Meyer and VIVA Investment Partners AG, file this Notice of Voluntary Dismissal and dismiss without prejudice all claims against the Defendants Rene Eichenberger, New Venture Associates, LLC, (ALTERNATIVE)2 Holding AG n/k/a New Venture Associates AG, Century Venture SA, John Textor, and Wyndcrest Holdings, LLC (the "Notice"). In support of this Notice, Plaintiffs state as follows:

1. During the Status Conference held on June 10, 2024 [ECF No. 47], the undersigned informed this Court that Reed Smith (the "Firm") had recently appeared in this matter and was in the process of reviewing the existing Complaint and considering the filing of an amended pleading. Accordingly, Plaintiffs moved for leave to file an Amended Complaint.

2. By Order of June 11, 2024, this Court gave Plaintiffs leave to file an Amended Complaint by July 10, 2024 [ECF No. 48].

3. In an effort to expedite these proceedings and avoid the protracted litigation of jurisdictional issues of first impression pertaining to the interpretation of the jurisdictional grant of 28 U.S.C. § 1332, Plaintiffs have decided to proceed with their claims in Florida State Court. Accordingly, Plaintiffs are filing a Complaint against Defendants in Florida State Court (the “State Action”).

4. Pursuant to Florida law, Plaintiffs will contact Defendants’ counsel of record in this matter to request that Defendants agree to waive service of process in the State Action.

Dated: July 10, 2024

Respectfully submitted,

/s/ Ana R. Ulseth

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 10, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel or parties of record.

By: /s/ Ana R. Ulseth  
Ana R. Ulseth